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Valerie Yates, Esq.  
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September 22, 2005

**Filed via ECFS**

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington DC 20554

Re: Subscriber Acknowledgement Report of Comcast Corporation (September 22, 2005)

Dear Ms. Dortch:

Please find enclosed the Subscriber Acknowledgement Report of Comcast Corporation, dated September 22, 2005, in WC Docket No. 05-196.

Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ Valerie Yates

Valerie Yates, Esq.  
Counsel – Telephony  
[Valerie\\_Yates@Comcast.com](mailto:Valerie_Yates@Comcast.com)

**Before the  
Federal Communications Commission**

In the Matter of	)	
	)	
E911 Requirements for IP-Enabled	)	WC Docket No. 05-196
Service Providers	)	
	)	

**COMCAST CORPORATION  
SUBSCRIBER ACKNOWLEDGEMENT REPORT  
SEPTEMBER 22, 2005**

Pursuant to the August 26, 2005 Public Notice issued by the Enforcement Bureau (“Bureau”) of the Federal Communications Commission (“Commission”) in WC Docket No. 05-196,<sup>1</sup> Comcast Corporation (“Comcast”)<sup>2</sup> submits this third report regarding its compliance with the Commission’s recently adopted Enhanced 911 (“E911”) requirements<sup>3</sup> on behalf of Comcast subsidiaries that are currently providing interconnected voice over Internet protocol (“VOIP”)

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<sup>1</sup> Enforcement Bureau Provides Further Guidance to Interconnected Voice Over Internet Protocol Service Providers Concerning Enforcement of Subscriber Acknowledgement Requirement, *Public Notice*, WC Docket Nos. 04-36 and 05-196 (rel. August 26, 2005).

<sup>2</sup> Comcast Corporation is principally involved in the development, management, and operation of broadband cable networks and programming content. Comcast Cable Communications, LLC, is the largest cable company in the United States, serving more than 21 million cable subscribers.

<sup>3</sup> IP-Enabled Services and E911 Requirements for IP-Enabled Service ProviderS, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-36 and 05-196 (rel. June 3, 2005) (“VOIP E911 Order”).

services.<sup>4</sup> This report supplements the information Comcast submitted on August 10, 2005 and September 1, 2005.<sup>5</sup>

As discussed in detail its August 10<sup>th</sup> Report, Comcast has received an affirmative acknowledgement of its E911 disclosures from all existing customers of its IP-enabled voice service through their consent to the terms of the Subscriber Agreement.<sup>6</sup> In addition, Comcast mailed supplemental E911 advisory information and warning stickers to all existing customers of its interconnected VOIP service as of the July 29, 2005 deadline. Comcast requires all new customers of its interconnected VOIP service to read and sign a work order form containing E911 advisory information at the time services are installed. Warning stickers are provided as part of the welcome kit for all new customers.

Comcast is continuing its efforts to obtain acknowledgements of the supplemental e911 advisory through emails and outbound calls. In addition, Comcast has implemented a system for intercepting in-bound calls to its customer care centers by non-responders and diverting them to an automated system used to provide the E911 advisory information and to obtain supplemental acknowledgements.

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<sup>4</sup> Comcast uses IP technology in the access network connected to the Class 5 switch serving a portion of its cable telephony customers in the Detroit market (“hybrid IP-circuit-switched service”). Comcast recently launched a new service that uses soft switches and Internet Protocol to transmit voice over its private, managed network (“IP-enabled voice service”). This filing encompasses both Comcast’s primary IP-enabled voice service as well as the hybrid IP-circuit-switched service. These services are referred to collectively as “interconnected VOIP service.”

<sup>5</sup> See E911 Requirements for IP-Enabled Service Providers, *Subscriber Notification Report of Comcast Corporation*, WC Docket No. 05-196 (filed August 10, 2005) (“August 10<sup>th</sup> Report”) and E911 Requirements for IP-Enabled Service Providers, *Subscriber Acknowledgement Report of Comcast Corporation*, WC Docket No. 05-196 (filed September 1, 2005) (“September 1<sup>st</sup> Report”).

<sup>6</sup> Comcast’s Detroit-area customers of its hybrid IP-circuit-switched service are deemed to have agreed to the terms and conditions of the tariff on file with the Michigan Public Service Commission.

For the reasons explained at length in its September 1<sup>st</sup> Report, Comcast continues to believe that “soft” disconnection is inappropriate for customers, like its own, who have access to E911 as part of the interconnected VOIP service to which each subscribes and who have been fully apprised of and agreed to the terms of Comcast’s interconnected VOIP service. In any event, Comcast maintains that implementing a “soft” disconnect procedure is infeasible due to the complex nature of the manual undertaking, significant risk of error that the procedures would entail, and the likelihood of causing irreparable harm to Comcast’s customer relations.

Comcast is continuing to make every reasonable effort to ensure compliance with the Commission’s supplemental notification requirements in the VOIP E911 Order. Representatives of Comcast would welcome the opportunity to discuss the matters presented in its reports should the Commission have any questions or require further information.

Respectfully submitted,

/s/ Joseph W. Waz Jr.  
Joseph W. Waz Jr.  
COMCAST CORPORATION  
1500 Market Street  
Philadelphia PA 19102

## CERTIFICATE OF SERVICE

I, Valerie Yates, hereby certify that a copy of the foregoing Subscriber Acknowledgement Report, filed by Comcast Corporation in WC Docket No. 05-196, was served by electronic mail on September 22, 2005 to the persons listed below.

/s/ Valerie Yates  
Valerie Yates

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